

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN (WATERLOO) DIVISION

UNITED STATES OF AMERICA,)	No. 19-CR-2075
)	
Plaintiff,)	INDICTMENT
)	
vs.)	Counts 1, 3
)	18 U.S.C. § 2261A(1): Interstate
MICHAEL SHAWN MCGUIRE,)	Stalking
)	
Defendant.)	Count 2
)	18 U.S.C. § 2261A(2): Cyberstalking

The Grand Jury charges:

Count 1
Interstate Stalking

On or about August 25, 2018, in the Northern District of Iowa, defendant MICHAEL SHAWN MCGUIRE, traveled in interstate commerce from Cresco, in the State of Iowa, to Spicer, in the State of Minnesota, with the intent to harass another person, K.B., and in the course of and as a result of such travel caused substantial emotional distress to K.B.

This was in violation of Title 18, United States Code, Section 2261A(1).

Count 2
Cyberstalking

Between on or about September 10, 2018, and September 20, 2018, in the Northern District of Iowa, defendant MICHAEL SHAWN MCGUIRE, with the intent to harass, intimidate, and cause substantial emotional distress to a person in another state, namely, Minnesota, used facilities of interstate or foreign commerce,

including Facebook and other forms of electronic communication, to engage in a course of conduct that caused substantial emotional distress to the victim, K.B.

This was in violation of Title 18, United States Code, Section 2261A(2).

Count 3
Interstate Stalking

On or about May 25, 2019, in the Northern District of Iowa, defendant MICHAEL SHAWN MCGUIRE, traveled in interstate commerce from Cresco, in the State of Iowa, to Spicer, in the State of Minnesota, with the intent to harass another person, K.B., and in the course of and as a result of such travel caused substantial emotional distress to K.B.

This was in violation of Title 18, United States Code, Section 2261A(1).

A TRUE BILL

/s/Foreperson *[Signature]* 12-3-19
Grand Jury Foreperson Date

PETER E. DEEGAN, JR.
United States Attorney

By: *[Signature]*
LISA C. WILLIAMS
Assistant United States Attorney

